

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

Jose Luis ROMERO-Ortiz,

Defendant.

Magistrate Case No.:

'08 MJ 8642

COMPLAINT FOR VIOLATION OF


21 U.S.C. § 952 and 960

Importation of a Controlled Substance  
(Felony)

The undersigned complainant being duly sworn states:

On or about July 14, 2008, within the Southern District of California, defendant Jose Luis ROMERO-Ortiz did knowingly and intentionally import approximately 22.50 kilograms (49.50 pounds) of cocaine, a Schedule II Controlled Substance, into the United States from a place outside thereof, in violation of Title 21, United States Code, Sections 952 and 960.

The complainant states that this complaint is based on the attached Statement of Facts incorporated herein by reference.

  
Timothy L. Henderson  
Special Agent  
U.S. Immigration & Customs  
Enforcement

SWORN TO, BEFORE ME, AND SUBSCRIBED IN MY PRESENCE THIS 15<sup>th</sup>  
DAY OF July, 2008.

  
Peter C. Lewis  
U.S. MAGISTRATE JUDGE

1 UNITED STATES OF AMERICA

2 v.

3 Jose Luis ROMERO-Ortiz

4 STATEMENT OF FACTS

5  
6 This complaint is based upon the personal observations, investigation and  
7 information provided to U.S. Immigration and Customs Enforcement Special Agent  
8 Timothy L. Henderson.

9  
10 On July 14, 2008, Jose Luis ROMERO-Ortiz entered the United States at the  
11 Calexico, California West Port of Entry. ROMERO was the driver of a Chevrolet  
12 passenger car. The Chevrolet was registered in ROMERO's name. Customs and  
13 Border Protection Officer (CBPO) M. Aguilar received a negative Customs declaration  
14 from ROMERO. CBPO Aguilar referred ROMERO for secondary inspection.  
15

16 Once in secondary, CBPO Aguilar continued the inspection of ROMERO. A  
17 search of the Chevrolet resulted in the recovery of 20 packages containing a white  
18 powdery substance. A sample of the powder field-tested positive for cocaine. The total  
19 weight of the packages was 22.50 kilograms.  
20

21 Special Agent (S/A) Timothy Henderson interviewed ROMERO. S/A R. Estrada  
22 read ROMERO his constitutional rights, per Miranda, in Spanish. ROMERO orally  
23 waived his rights, as well as signing the written waiver of rights, agreeing to make a  
24 statement.  
25

26 ROMERO stated that he believed that controlled substances would be in the  
27 Chevrolet. ROMERO said that he would be paid to cross the Chevrolet into the United  
28 States.  
29